

Honorable Robert J. Bryan

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GEORGE DC PARKER II and LORI A.
PARKER,

Plaintiff(s),

v.

THE SOCIETY FOR CREATIVE
ANACHRONISM, INC., a/k/a/ "SCA" or
"SCA, Inc.", et.al,

Defendant(s).

NO. 3:23-cv-05069-RJB

DECLARATION OF EBEN KURTZMAN IN
SUPPORT OF THE SOCIETY FOR
CREATIVE ANACHRONISM, INC'S
MOTION TO VACATE DEFAULT
JUDGMENT

I, Eben Kurtzman, am over the age of 18 and competent to testify to the matters contained in this declaration.

1. I have been a licensed active attorney in the State of California since December of 1989 and have been in house counsel for The Society for Creative Anachronism Inc. ("SCA") since May of 2022. This position is primarily volunteer. I have been a member of the SCA for over 30 years. I am not licensed to practice law in the State of Washington.

2. I am informed and believe that in January of 2023, George Parker and Lori Parker threatened to file a lawsuit against the SCA if they weren't reinstated as members. SCA learned

DECLARATION OF EBEN KURTZMAN IN SUPPORT
OF THE SOCIETY FOR CREATIVE ANACHRONISM,
INC'S MOTION TO VACATE DEFAULT JUDGMENT - 1
11010-0002 parker default dec
NO. 3:23-cv-05069-RJB

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1 a lawsuit was filed in February of 2023 and for reasons unknown to SCA was rejected by the
2 Court. When the SCA learned of this, SCA signed up for a service called court listener to get
3 notification if the Parkers attempted to file a complaint in court again.

4 3. The SCA learned through court listener that this complaint had been filed on May
5 14, 2023. I was personally advised of this filing by email on May 14, 2023 but was on vacation
6 and didn't check my email until I returned from vacation on May 16, 2023. On May 16, 2023 at
7 approximately 6:30 p.m. the SCA learned that a proof of service had been filed.

8 4. The SCA contacted CT Corporation, our agent for service of process, on May 17,
9 2023 to find out if CT Corporation had been served with this complaint and if so, what had been
10 done with it. The SCA learned that the complaint had been sent to the wrong address by CT
11 Corporation.

12 5. I then learned that default had been entered in this case. On May 18, 2023 the
13 SCA contacted their insurance carrier and I began seeking counsel in Washington State to
14 represent the SCA in this matter.

15 I declare under penalty of perjury under the laws of the State of California and Washington
16 that the foregoing is true and correct.

17 DATED this 23 day of May, 2023 in Apple Valley, California.

18
19 By 
20 Eben Kurtzman
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DECLARATION OF SERVICE

I hereby declare that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record listed below:

**Counsel for Plaintiffs George DC
Parker II and Lori A. Parker:**

George DC Parker II
Lori A. Parker
10710 199th Street East
Graham, WA 98338

☐ Via Messenger

☐ Via Facsimile –

☒ Via U.S. Mail, postage prepaid

☐ Via Overnight Mail, postage prepaid

☒ Via Court E-Service or email with recipient's approval
thenorsegypsyforge@gmail.com

DATED at Seattle, Washington, this 23rd day of May, 2023.

/s/ Justin E. Bolster

Justin E. Bolster, WSBA #38198